

EXHIBIT A

ANDREA FOLLETT

From: RICHARD McCORD
Sent: Friday, March 7, 2025 1:18 PM
To: David Broderick; Raymond Verdi
Cc: ANDREA FOLLETT
Subject: Fraleg Group, Inc., Chapter 7, Case No. 22-41410-jmm

Importance: High

I have sent several emails requesting a status of this matter and have not received a response. Pursuant to the Stipulation of Settlement, approved pursuant to Court Order dated January 31, 2025, the Trustee was to receive the settlement funds in the amount of \$225,000.00, by March 2, 2025. To date, these funds have not been received.

If I do not receive the funds within five (5) business days of the date of this email, I will file an Affidavit of Non-Compliance with the Court, and the deposit received in the amount of \$25,000.00 will be retained by the bankruptcy estate as liquidated damages.

Please be guided accordingly.



Richard J. McCord, Esq.
Co-Chair, Bankruptcy and
Creditor/Debtor Rights Practice Group
Certilman Balin Adler & Hyman, LLP
90 Merrick Avenue, 9th Floor
East Meadow, NY 11554

☎ Direct 516.296.7801 | ☎ Firm 516.296.7000 | ☎ Fax 516.296.7111

✉ Email: rmccord@certilmanbalin.com | [my profile](#) | www.certilmanbalin.com

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From: RICHARD McCORD <rmccord@certilmanbalin.com>
Sent: Tuesday, March 4, 2025 3:33 PM
To: David Broderick <brodericklegal@gmail.com>; Raymond Verdi <rverdi@verdilawpc.com>
Cc: ANDREA FOLLETT <afollett@certilmanbalin.com>
Subject: Fraleg Group, Inc., Chapter 7, Case No. 22-41410-jmm

Good afternoon,

I am following up to my below email.

Plesae provide the reason for the request for the extension of time to forward the settlement funds.

Thank you.



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From: RICHARD McCORD <rmccord@certilmanbalin.com>
Sent: Friday, February 28, 2025 3:29 PM
To: David Broderick <brodericklegal@gmail.com>
Cc: Raymond Verdi <rverdi@verdilawpc.com>; ANDREA FOLLETT <afollett@certilmanbalin.com>
Subject: RE: Fraleg Group, Inc., Chapter 7, Case No. 22-41410-jmm

What is the reason for the request for the extension?



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From: David Broderick <brodericklegal@gmail.com>
Sent: Friday, February 28, 2025 1:25 PM
To: RICHARD McCORD <rmccord@certilmanbalin.com>
Cc: Raymond Verdi <rverdi@verdilawpc.com>; ANDREA FOLLETT <afollett@certilmanbalin.com>
Subject: Re: Fraleg Group, Inc., Chapter 7, Case No. 22-41410-jmm

External Email: Proceed with caution!

Good Afternoon:

The Attorney, Mr. Broderick, has been out for a week and a half due to illness, and will formally get back to you by Monday.

Mr. Broderick has spoken with his client and is kindly requesting an extension of until March 21st if possible.

Thank you for your understanding.

Best Regards,
Amanda Gomes
Paralegal

On Thu, Feb 27, 2025 at 2:56 PM RICHARD McCORD <rmccord@certilmanbalin.com> wrote:

Gentleman,

I have sent several emails requesting a status as to when I will be in receipt of the settlement funds in the amount of \$225,000.00 pursuant to the Stipulation of Settlement, approved pursuant to Court Order dated January 31, 2025. To date, these funds have not been received and are due to be received by tomorrow.

Please provide a status.

Thank you.



Richard J. McCord, Esq.

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From: RICHARD McCORD <rmccord@certilmanbalin.com>
Sent: Thursday, February 20, 2025 12:52 PM
To: Raymond Verdi <rverdi@verdilawpc.com>; David Broderick <brodericklegal@gmail.com>
Cc: ANDREA FOLLETT <afollett@certilmanbalin.com>
Subject: Fraleg Group, Inc., Chapter 7, Case No. 22-41410-jmm
Importance: High

Good afternoon,

I am following up to the below emails.

Please advise as to when I will be in receipt of the settlement funds in the amount of \$225,000.00.

Thank you.



Richard J. McCord, Esq.

Co-Chair, Bankruptcy and

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From: RICHARD McCORD <rmccord@certilmanbalin.com>
Sent: Thursday, February 6, 2025 12:45 PM
To: Raymond Verdi <rverdi@verdilawpc.com>; David Broderick <brodericklegal@gmail.com>
Cc: ANDREA FOLLETT <afollett@certilmanbalin.com>
Subject: Fraleg Group, Inc., Chapter 7, Case No. 22-41410-jmm
Importance: High

Good afternoon,

Please confirm receipt of the below email and advise when I will be in receipt of the settlement funds in the amount of \$225,000.00.

Thank you.



Richard J. McCord, Esq.

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you are not the intended recipient, please contact the sender by reply e-mail, delete and then destroy all copies of the original message.

From: RICHARD McCORD <rmccord@certilmanbalin.com>

Sent: Friday, January 31, 2025 3:45 PM

To: Raymond Verdi <rverdi@verdilawpc.com>; David Broderick <brodericklegal@gmail.com>

Cc: ANDREA FOLLETT <afollett@certilmanbalin.com>

Subject: Fraleg Group, Inc., Chapter 7, Case No. 22-41410-jmm

Importance: High

Good afternoon,

Attached hereto please find the Order Pursuant to Rule 9019(a) of the Federal Rules of Bankruptcy Procedure Authorizing Compromise and Settlement, signed by the Honorable Jil Mazer-Marino on January 31, 2025 in connection with the above referenced matter.

Pursuant to the Stipulation of Settlement, please instruct your client to pay the remaining settlement sum to the Trustee in the amount of \$225,000.00 within thirty (30) days of the date of this Order. The certified bank check is to be made payable to "Richard J. McCord, as Chapter 7 Trustee for the Estate of Fraleg Group, Inc.".

Please do not hesitate to contact me should you have any questions.

Thank you.



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PLEASE NOTE NEW ADDRESS - WE HAVE MOVED

DAVID J BRODERICK LLC
69-02 Austin Street
THIRD FLOOR
Forest Hills, NY 11375
Phone: (718) 830-0700
Fax: 718-228-4271

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